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Attorneys for Defendants  
7 Bayer Healthcare Pharmaceuticals Inc.;  
Berlex Laboratories, Inc.; TheraCom, LLC;  
8 and CVS Caremark, Inc.

9  
10 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

11 NANCY WHITEHORSE,

12 Plaintiff,

13 v.

14 BAYER HEALTHCARE  
15 PHARMACEUTICALS INC.; BERLEX  
LABORATORIES, INC.; THERACOM,  
16 LLC; and CVS CAREMARK, INC.;

17 Defendants.  
18

) Case No.

)  
)  
) **CORPORATE DISCLOSURE**  
) **STATEMENT**

) [Filed concurrently with Notice of  
) Removal, Notice of Interested Parties,  
) Notice of Related Case, Declaration of  
) Paul B. La Scala]

19 Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Bayer  
20 HealthCare Pharmaceuticals Inc. makes the following corporate disclosure statement:

- 21 1. Bayer HealthCare Pharmaceuticals Inc. is a nongovernmental entity.
- 22 2. Bayer HealthCare Pharmaceuticals Inc. is a Delaware corporation, all of  
23 whose issued and outstanding shares of common stock and Senior Preferred Stock are  
24 owned by Schering Berlin Inc., and all of whose issued and outstanding shares of  
25 Junior Preferred Stock are owned by Bayer Inc.
- 26 3. Schering Berlin Inc. is a Delaware corporation and is wholly-owned by  
27 Bayer HealthCare Holdings LLC.  
28

1           4.     Bayer HealthCare Holdings LLC is a Delaware limited liability company.  
2     The sole member of Bayer HealthCare Holdings LLC is Bayer Corporation, and as  
3     such, Bayer HealthCare Holdings LLC is wholly-owned by Bayer Corporation

4           5.     Bayer Corporation is an Indiana corporation and is wholly-owned by  
5     Bayer US Holding LP.

6           6.     Bayer US Holding LP is a Delaware limited partnership, in which Bayer  
7     World Investments B.V. is the sole and controlling General Partner, and Bayer  
8     Solution B.V. is the sole Limited Partner.

9           7.     Bayer Solution B.V. is a private company with limited liability  
10    incorporated under the laws of the Netherlands and is wholly-owned by Bayer World  
11    Investments B.V.

12          8.     Bayer World Investments B.V. is a private company with limited liability  
13    incorporated under the laws of the Netherlands and is wholly-owned by Bayer AG.

14          9.     Bayer Inc. is a Canadian business corporation whose shares are owned by  
15    Bayer Canadian Holdings Inc. and Bayer Global Investments B.V.

16          10.    Bayer Canadian Holdings Inc. is a Canadian business corporation whose  
17    shares are wholly-owned by Bayer Corporation.

18          11.    Bayer Global Investments B.V. is a private company with limited  
19    liability incorporated under the laws of the Netherlands and whose shares are owned  
20    by Bayer Gesellschaft für Beteiligungen mbH and Bayer CropScience AG.

21          12.    Bayer Gesellschaft für Beteiligungen mbH is a private company with  
22    limited liability formed under the laws of Germany and whose shares are owned by  
23    Bayer Pharmaceuticals AG and Bayer AG.

24          13.    Bayer Pharmaceuticals AG is a German corporation whose shares are  
25    wholly-owned by Bayer AG.

26          14.    Bayer CropScience AG is a Germany corporation whose shares are  
27    wholly-owned by Bayer AG.

1           15. Bayer AG is a German corporation whose stock is publicly traded in  
2 Germany. Bayer AG has no parent company and no publicly held company which  
3 owns 10 percent or more of its stock.

4  
5 Dated: February 19, 2015

Respectfully submitted,  
SHOOK HARDY & BACON L.L.P.

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8 By: /s/ Tony M. Diab  
                    Paul La Scala  
                    Tony Diab  
9 Attorneys for Defendants  
10 Bayer Healthcare Pharmaceuticals Inc.;  
11 Berlex Laboratories, Inc.; TheraCom,  
12 LLC; and CVS Caremark, Inc.  
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